

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO

IN RE:

CASE NO. 12-04078 EAG

IRMA ADELINA RODRÍGUEZ COSSÍO

CHAPTER 13

DEBTOR(S)

MOTION FOR RECONSIDERATION

TO THE HONORABLE COURT:

COMES NOW, Debtor represented by the undersigned counsel and very respectfully states:

1. The present case was dismissed on July 8, 2013.
2. The reason for the dismissal was the failure to submit evidence of having cured the arrears under the plan dated February 21, 2013.
3. Debtor is self-employed and is engaged in rendering speech therapy services to private patients; however, her main source of income is for services provided to the Puerto Rico Department of Education ("PRDE") and income from a domestic support obligation for her youngest child.
4. The PRDE has failed to pay for services rendered as well as the domestic support obligation from her former spouse has also incurred in arrears. Due to this situation arrears have accrued.

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5. Debtor has received partial payments for her services that have allowed her to make one payment in June; furthermore, she is currently engaged in the collection of the domestic support owed and she is taking the necessary steps towards the collection of the amounts owed as a consequence of the liquidation of the conjugal partnership with her former husband.

6. The collection efforts will allow her to cure the arrears under the plan.

7. Debtor is interested in continuing with their bankruptcy case since the same is the only way she can restructure her financial situation. Once the dismissal is vacated the amended schedules C will be filed requested by the Trustee.

**WHEREFORE,** for the reasons stated above it is respectfully requested from the Court to take notice of the above and vacate the order dismissing the case.

**RESPECTFULLY SUBMITTED.**

**NOTICE TO CREDITORS AND PARTIES IN INTEREST:** Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or

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(iii) in the opinion of the Court, the interest of justice requires otherwise. F.R.B.P. 9006; L.B.R. 9013-1 (h)(1); G.O. 09-02.

In Bayamón, Puerto Rico, this 21<sup>st</sup> day of August 2013.

**HERMAN F. VALENTÍN & ASSOCIATES**

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By: /s/Herman F. Valentín Figueroa  
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USDC-PR # 201904